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May 28, 2019

VIA CM/ECF AND ELECTRONIC MAIL

The Honorable Joel Schneider
United States Magistrate Judge
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101
[856-757-5446](tel:856-757-5446)
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**Re: *In re Valsartan Products Liability Litigation*, U.S. District Court for the
District of New Jersey; Case No. 1:19-md-02875-RBK-JS**

Dear Judge Schneider:

Enclosed is the current redlined draft of the proposed Confidentiality and Protective Order prepared by the parties. Following several meet and confers, the parties have made significant progress and only a few disputed areas remain for the Court's resolution. Plaintiffs' proposed edits that Defendants have rejected are indicated on the draft in blue line. The parties have flagged paragraphs 21 and 31 with comments for further discussion, as well.

Major areas of disagreement are addressed in the joint agenda submitted on May 24, 2019. (Doc. 107). The parties are prepared to address each of these items further, and look forward to discussing these issues with the Court during the May 29, 2019, in-person Case Management Conference.

Respectfully,

/s/ Lori G. Cohen
Lori G. Cohen, Esq.
*Attorney for Teva Pharmaceuticals USA,
Inc. and Teva Pharmaceutical Industries
Ltd.*

Enclosures

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cc: Victoria Lockard, Esq. (*via email*)
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Adam Slater, Esq. (*via email, for distribution to Plaintiffs' Counsel*)
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